

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,

Plaintiff,

v.

HARRY M. FREEDMAN, M.D.,  
DONNA BURNS, DR., and  
MAJOR R. L. HUGHES,

Defendants.

C.A. No. 04-1205-SLR  
JURY TRIAL OF 12 DEMANDED

**NOTICE OF SERVICE**

I, DIANE M. ANDREWS, ESQUIRE, hereby certify that DEFENDANT, HARRY M. FREEDMAN, M.D.'s, RESPONSE TO PLAINTIFF'S MOTION OF REVIEW PARTICULAR PENAL SANCTIONS AND ARTIFICE was served via e-filing to the following individual(s):

Jeffrey Alonzo Simms  
SBI #198625  
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Unit V-Building A-Tier  
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Smyrna, DE 19977

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ELZUFON, AUSTIN, REARDON,  
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/S/Diane M. Andrews  
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Attorney for Defendant,  
Harry M. Freedman, M.D.

Dated: June 6, 2006

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FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,	:	
	:	
Plaintiff,	:	C.A. No. 04-1205-SLR
	:	
v.	:	
	:	TRIAL BY JURY OF
	:	TWELVE DEMANDED
HARRY M. FREEDMAN, M.D.,	:	
DONNA BURNS, DR., and	:	
MAJOR R. L. HUGHES,	:	
	:	
Defendants.	:	

**DEFENDANT HARRY M. FREEDMAN, M.D.'S  
RESPONSE TO PLAINTIFF'S MOTION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion, docketed on May 23, 2006, and states as follows:

1. This Motion is unintelligible and Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL, P.A.

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DATE: May 31, 2006